



February 19, 2004

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Ex Parte Presentation

In the Matter of AT&T's Petition for Declaratory Ruling That AT&T's Phone-to-Phone IP Telephone Services Are Exempt from Access Charges, WC Docket No. 02-361

In the Matter of Developing a Unified Inter-carrier Compensation Regime, CC Docket No. 01-92

Dear Ms. Dortch:

On February 18, 2004, Michael Urdahl, Vice President-Government Affairs, and I met with Scott Bergman, legal advisor to FCC Commissioner Adelstein, to present Great Plains Communications' positions on issues in the above proceeding.

We urged the Commission to deny AT&T's petition for declaratory ruling to exempt its Voice over Internet Protocol ("VoIP") service from inter-carrier compensation obligations, particularly because of the effects such action would have on universal service to customers in areas of the nation served by rural local exchange carriers. In addition, we recommended that contrary to AT&T's latest recommendation to the FCC, a decision on the AT&T VoIP service should not be deferred to the FCC's inter-carrier compensation docket. Doing so would only continue to unnecessarily delay the establishment of a policy-based foundation for the FCC's upcoming review of inter-carrier compensation issues related to such services.

Also, we urged that since AT&T's service clearly utilizes other carriers' networks, there is a duty to compensate those carriers. We explained that not requiring AT&T to pay for the use of networks will only further the growing chaos that exists for rural ILECs in maintaining network and universal service cost recovery, and thus incentives to invest in rural infrastructure will be greatly diminished.

Finally, we challenged AT&T's recent representations before the FCC that all inter-carrier compensation will be eliminated in the future in CC Docket No. 01-92, therefore making it appropriate for the FCC to defer decision on this petition. In rural ILEC service areas, we noted that cost-based inter-carrier compensation should remain part of balanced long-term cost recovery in order to continue meet rural customers' universal service needs.

Consistent with Commission rules, one electronic copy of this letter and the attachment are being submitted for the record of both of the above-referenced dockets.

Sincerely,

Ken Pfister
Vice President-Strategic Policy
Attachment